

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH DAKOTA
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

CR 4:24-cr-40117

Plaintiff,

REDACTED INDICTMENT

v.

Production of Child Pornography
(18 U.S.C. §§ 2251(a) and 2251(e))

JAYKOB ELIJAH VARNER,

Cyberstalking
(18 U.S.C. § 2261A(2)(B))

Defendant.

Forfeiture Notice
(18 U.S.C. § 2253)

The Grand Jury charges:

COUNT 1

On or about between August 1, 2023 and April 13, 2024, in the District of South Dakota, the defendant, Jaykob Elijah Varner, did knowingly employ, use, persuade, induce, entice, and coerce [Name Redacted], a minor who had not attained the age of 18, to engage in sexually explicit conduct for the purpose of producing visual depictions of such conduct, knowing and having reason to know that such visual depiction would be transported in interstate or foreign commerce or mailed, and such visual depiction would be produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, including by computer, and attempted to do so, all in violation of 18 U.S.C. §§ 2251(a) and 2251(e).

COUNT 2

On or about between August 1, 2023 and April 13, 2024, in the District of South Dakota and elsewhere, the defendant, Jaykob Elijah Varner, with the intent to harass, intimidate, and place under surveillance with intent to harass and intimidate another person, specifically [Name Redacted], a person under the age of 18 when the offense occurred, did use an interactive computer service, electronic communication service, electronic communication system of interstate commerce, and other facility of interstate and foreign commerce to engage in a course of conduct that caused, attempted to cause, and would be reasonably expected to cause substantial emotional distress to [Name Redacted], all in violation of 18 U.S.C. §§ 2261A(2)(B) and 2261B.

A TRUE BILL:

Name Redacted

Foreperson

ALISON J. RAMSDELL
United States Attorney

By Conny Lawer

FORFEITURE NOTICE

1. The allegations contained in this Indictment are re-alleged as if fully set forth here, for the purpose of alleging forfeiture, pursuant to 18 U.S.C. § 2253.

2. If convicted of an offense set forth above, Jaykob Elijah Varner, the

Defendant herein, shall forfeit to the United States any and all materials or property used or intended to be used in the possession, receipt, distribution and production of child pornography. Such property includes, but is not limited to:

1. Cellular phone seized from Defendant.